## LOEVY & LOEVY

311 N. Aberdeen St., 3rd Floor, Chicago, Illinois 60607

February 16, 2022

## **BY ECF**

Hon. John G. Koeltl United State District Judge United States Courthouse 500 Pearl Street New York, NY 10007

Re: BuzzFeed Inc. v. U.S. Department of Justice, 21 Civ. 7533 (JGK)

Dear Judge Koeltl:

Due to an administrative error, Plaintiff's counsel failed to calendar the deadline for Plaintiff's combined response to Defendant's summary judgment motion and Plaintiff's cross-motion for summary judgment. Plaintiff's counsel has now remedied the issue that caused the error. Plaintiff apologizes for the inconvenience to the Court and to Defendant, and respectfully requests that the court grant Plaintiff 28 days to file its brief, and to amend the schedule as follows:

- March 15, 2022: Plaintiff files its opposition to DOJ-OIG's motion and its crossmotion
- April 15, 2022: DOJ-OIG files its reply in support of its motion and its opposition to Plaintiff's cross-motion
- April 29, 2022: Plaintiff files its reply in support of its cross-motion

Counsel for Defendant represents that the government takes no position on this request. If the Court denies this request, the government would ask the Court to consider the motion fully submitted

We thank the Court for its consideration of this matter.

Respectfully,

/s/ Matthew V. Topic

Matthew V. Topic LOEVY & LOEVY 311 N. Aberdeen St., 3<sup>rd</sup> Fl. Chicago, IL 60607 foia@loevy.com

cc: Counsel for Defendant (by ECF)